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 HYNIX SEMICONDUCTOR, INC. and
 HYNIX SEMICONDUCTOR AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

<p>In re DRAM ANTITRUST LITIGATION</p> <hr/> <p>This Document Relates to:</p> <p>ALL ACTIONS</p>	<p>Master File No. M-02-1486 PJH</p> <p>MDL. No. 1486</p> <p>STIPULATION AND [PROPOSED] ORDER RE SCHEDULING OF CERTAIN DEPOSITIONS OF HYNIX WITNESSES</p>
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STIPULATION

This Stipulation is entered into between the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs and defendants Hynix Semiconductor, Inc. and Hynix Semiconductor America, Inc. (collectively "Hynix"), and is made with regard to the following facts:

A. WHEREAS the Direct Purchaser Plaintiffs and the Indirect Purchaser Plaintiffs have noticed the depositions of certain foreign Hynix witnesses, including Dae Soo Kim, Chae Kyun Chung, Kun Chul Suh, Choon Yoob Choi, In Jae Kim, and Hyun Jun Kim; and

B. WHEREAS plaintiffs' deposition notices set the location of the depositions as San Francisco, California; and

C. WHEREAS DS Kim, CK Chung, KC Suh, CY Choi, IJ Kim, and HJ Kim all work and reside outside the United States; and

D. WHEREAS Hynix believed that the depositions of DS Kim, CK Chung, KC Suh, IJ Kim, and HJ Kim should take place in Seoul, Korea; and

E. WHEREAS the dispute over the locations of the depositions of DS Kim, CK Chung, KC Suh, IJ Kim, and HJ Kim had been submitted to Magistrate Judge Spero for resolution; and

F. WHEREAS by prior court order the discovery cut-off for discovery common to the direct and indirect purchaser actions is May 12, 2006; and

G. WHEREAS the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs and Hynix were able to reach a consensual resolution to their dispute.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. The depositions of DS Kim, CK Chung, KC Suh, IJ Kim, and HJ Kim will take place in the United States within the Northern District of California or another judicial district as agreed upon by the parties.


2. To permit time for necessary arrangements to be made, the depositions of DS Kim, CK Chung, KC Suh, CY Choi, IJ Kim, and HJ Kim will occur after the May 12, 2006 discovery cut-off previously ordered by the Court.

3. The Hynix depositions will be completed prior to July 31, 2006.

SO STIPULATED.

Dated: May 15, 2006

KENNETH R. O'ROURKE
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By: 
Steven H. Bergman

Attorneys for Defendants
HYNIX SEMICONDUCTOR, INC.
HYNIX SEMICONDCUTOR AMERICA,
INC.

Dated: May __, 2006

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By: _____
Francis A. Bottini, Jr.

Co-Lead Counsel for the Direct Purchaser
Plaintiffs

Dated: May __, 2006

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TRACY KIRKHAM
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Co-Lead Counsel for the Indirect Purchaser
Plaintiffs

05-12-2006 02:50pm From-WOLF HALDENSTEIN

1-618-234-4599

T-865 P.004/005 F-633

2. To permit time for necessary arrangements to be made, the depositions of DS Kim, CK Chung, KC Suh, CY Choi, IJ Kim, and HJ Kim will occur after the May 12, 2006 discovery cut-off previously ordered by the Court.

3. The Hynix depositions will be completed prior to July 31, 2006.
SO STIPULATED.

Dated: May __, 2006

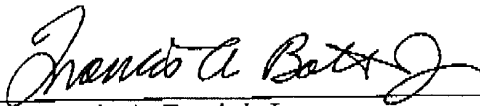
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HYNIX SEMICONDUCTOR, INC.
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INC.

Dated: May 12, 2006

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By: 
Francis A. Bottini, Jr.

Co-Lead Counsel for the Direct Purchaser
Plaintiffs

Dated: May __, 2006

JOSEPH COOPER
TRACY KIRKHAM
COOPER & KIRKHAM

By: _____
Tracy Kirkham

Attorneys for the Indirect Purchaser Plaintiffs

1 2. To permit time for necessary arrangements to be made, the
2 depositions of DS Kim, CK Chung, KC Suh, CY Choi, IJ Kim, and HJ Kim will occur
3 after the May 12, 2006 discovery cut-off previously ordered by the Court.

4 3. The Hynix depositions will be completed prior to July 31, 2006.
5 SO STIPULATED.

6 Dated: May __, 2006

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8
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10 By: _____
 Steven H. Bergman

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12 Attorneys for Defendants
13 HYNIX SEMICONDUCTOR, INC.
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14 Dated: May __, 2006

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18 By: _____
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19 Co-Lead Counsel for the Direct Purchaser
20 Plaintiffs

21 Dated: May 15, 2006

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TRACY KIRKHAM
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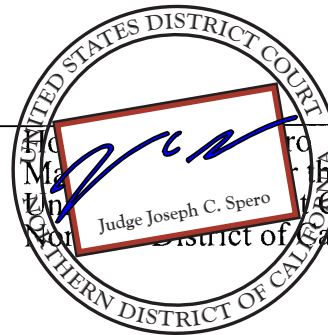
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24 By: Tracy R. Kirkham
 Tracy Kirkham

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26 Co-Lead Counsel for the Indirect Purchaser
27 Plaintiffs
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ORDER

Pursuant to the Stipulation of the parties, the Court finds good cause for continuing the depositions of DS Kim, CK Chung, KC Suh, CY Choi, IJ Kim and HJ Kim beyond the May 12, 2006 discovery cut-off and adopts the Stipulation between the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs and Hynix as an Order of this Court.

Dated: May 16, 2006



Court for the
District of California